



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY PIEDMONT REGIONAL OFFICE

Molly Joseph Ward  
Secretary of Natural Resources

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David K. Paylor  
Director

Jeffery Steers  
Regional Director

October 17, 2017

Mr. Randy Petrie  
Reynolds Consumer Products – Bellwood Printing  
2001 Reymet Road  
Richmond, VA 23237-3798

Location: Chesterfield County  
Registration No.: 50260

Dear Mr. Petrie:

Attached is a renewal Title V permit to operate your facility pursuant to 9 VAC 5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning November 3, 2017.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on June 5, 2017 and solicited written public comments by placing a newspaper advertisement in Style Weekly on August 30, 2017. The thirty-day required comment period, provided for in 9VAC 5-80-270 expired on October 2, 2017.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This approval to operate does not relieve Reynolds Consumer Products LLC of the responsibility to comply with all other local, state, and federal permit regulations.

To review any federal rules referenced in the attached permit, the US Government Publishing Office maintains the text of these rules at [www.ecfr.gov](http://www.ecfr.gov), Title 40, Parts 60, 63, and 70.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director  
Department of Environmental Quality  
P. O. Box 1105  
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please contact the regional office at (804) 527-5020.

Sincerely,



Kyle Ivar Winter, P.E.  
Deputy Regional Director

KIW/clm/50260-24

Attachment: Permit

cc: Director, OAPP (electronic file submission)  
Director, Office of Permits and Air Toxics (3AP10), U.S. EPA, Region III (electronic file submission)  
Manager/Inspector, Air Compliance (electronic file submission)



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### Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Reynolds Consumer Products LLC
Facility Name:	Reynolds Consumer Products LLC
Facility Location:	2001 Reymet Road Richmond (Chesterfield County), Virginia 23237-3798
Registration Number:	50260
Permit Number:	PRO50260

This permit includes the following programs:

### Federally Enforceable Requirements - Clean Air Act (Pages 3-35)

November 3, 2017

Effective Date

November 2, 2022

Expiration Date

Kyle Ivar Winter, P.E.  
Deputy Regional Director

October 17, 2017

Signature Date

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Permit Conditions, 32 pages  
Attachment A

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## **Facility Information**

Permittee  
Reynolds Consumer Products LLC  
1900 W. Field Court  
Lake Forest, IL 60045

Responsible Official  
Randy Petrie  
Plant Manager

Facility  
Reynolds Consumer Products – Bellwood Printing  
2001 Reymet Road  
Richmond, VA 23237-3798

Contact Person  
Terence Graves  
EHS Manager  
(804) 743-6038

**County-Plant Identification Number: 51-041-00058**

**Facility Description:** NAICS 323111 and 322212 – The main operations at Reynolds Consumer Products Inc. include rotogravure printing, cutting and folding cartons and spooling paper (parchment, freezer and pan liner). The operations at the plant consist of printing on paper, board and aluminum foil for packaging products. The plant also has the ability print on film and produce thermal and extrusion laminating for packaging products. The plant also can conduct other converting operations such as slitting, die cutting, and gluing.

The facility is a Title V major source of Volatile Organic Compounds and Hazardous Air Pollutants. This source is located in an attainment area for all pollutants, and is a PSD minor source. Much of the equipment at the plant is existing (the boilers, Presses 1-4, Extruder 1-3, and Laminator 3). The facility currently holds a minor NSR permit dated May 15, 2002 for Laminator 2 and another for the washroom, dated May 30, 2001.

Since the last Title V Renewal was issued on November 11, 2012, there have been several changes at the facility. Presses 6-11 were demolished and removed. Accordingly, NSR permits for Press 7 (October 29, 1998), Laminator CIG1 (March 17, 2000) and Extruder 5 (August 5, 2002) were rescinded by mutual agreement between DEQ and Reynolds Consumer Products LLC on May 5, 2017.

The facility's source-specific VOC RACT Consent Agreement dated October 31, 1986 was incorporated into a State Operating Permit on October 20, 2015.

The boilers (constructed prior to 1975) became subject to the Boiler MACT for units designed to burn gas 1 fuels (No. 6 fuel oil is for emergency use only), and a new emergency diesel fire pump was installed and is subject to NSPS Subpart III.

## Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Fuel Burning Equipment</b>							
1	1	19 Erie City Boiler #SAGOH-A18 (natural gas)	26 MMBtu/hr	—	—	—	(Grandfathered/ existing source)
2	2	20 Erie City Boiler #SAGOH-15 ( natural gas)	13.3 MMBtu/hr	—	—	—	(Grandfathered/ existing source)
3	3	21 Erie City Boiler #SAGOH-15 (natural gas)	20.3 MMBtu/hr	—	—	—	(Grandfathered/ existing source)
<b>Process Equipment</b>							
21-1	—	Champlain Press 1 with a 55 inch max. web width for film, foil and paper (1975)	850 ft/min	—	—	—	October 20, 2015
21-2	—	Champlain Press 2 for film, foil and paper (pre-1975)	800 ft/min	—	—	—	
21-3	4	Champlain Press 3 for film, foil and paper (pre-1975)	1,100 ft/min	Smith – Thermal Oxidizer with an estimated 70% capture efficiency and an actual 94% destruction efficiency (controls all stations except the treat station).	CD002	VOC	
21-4	—	Champlain Press 4 for film, foil and paper (pre-1975)	710 ft/min	—	—	—	
21-10	—	Egan Extruder 1 for film, foil and paper (pre-1975)	1,010 ft/min	—	—	—	
21-11	—	Dilts/Egan Extruder 2 for film, foil and paper (pre-1975)	1,025 ft/min	—	—	—	
21-12	—	Dilts/Egan Tandem Extruder 3 for film, foil and paper (pre-1975)	1,000 ft/min	—	—	—	

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
24	7	Intra Roto Laminator 3 for film, foil and paper (pre-1975)	1,000 ft/min	—	—	—	October 20, 2015
29	012	Rotomec 73534 Laminator 2 for film, foil and paper with a max. web width: 50" (1995)	Max. Web Width: 50"(No speed limitation when using inks and coatings that contain no VOCs per Condition No. 7 of the May 15, 2002 permit.)	—	—	VOC	May 15, 2002
30	013	Rotomec 73534 Laminator 2 for film, foil and paper with a max. web width: 50" (1995)	Max. Web Width: 50"/1,000 ft/min (When using non-compliant coating)	Laminator 2 Wheelabrator – Thermal Oxidizder with a permanent total enclosure	CD003	VOC	May 15, 2002
31	14	(12) Upright Faustel/Diamond Metal Edgers for film, foil and paper (pre-1975)	210 units/min (estimated)	—	—	—	—
		Ink Room Mixing	—				
		Miscellaneous Clean & Lube	—				

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
32-1	015	Progressive Recovery, Inc. (PRI) Three Washing Machines for press parts (1994)	1 cycle/hr except when using low volatile based cleaning solution (4.5% VOC or less), the rating shall be no more than 3 cycles/hour.	Progressive Recovery System – Air to Water Heat Exchanger	CD004-CD006	VOC	May 30, 2001
32-2		Manual Wash Tank (pre-1975)	19.5 sq.ft. open area (15 gallons)	—	—		
T01 & T14	014	(2) Aboveground Solvent Storage Tanks (1988)	5,000 gallons (each)	Each listed tank has a submerged fill pipe.	—	VOC	—
T02-T13		(12) Aboveground Solvent Storage Tanks (1988)	3,000 gallons (each)				
T15 & T16		(2) Aboveground Solvent Storage Tanks (1988)	4,000 gallons (each)				
T18		(1) Aboveground Solvent Storage Tank (1988)	10,000 gallons				

## **Fuel Burning Equipment Requirements – Boilers (Emission Unit ID #1, 2 and 3)**

1. **Fuel Burning Equipment Requirements – (Emission Unit ID #1, 2 and 3) – Limitations** - Emissions from the operation of the 26 MMBtu/hr 19 Erie City Boiler SAGOH-A18#6, the 13.3 MMBtu/hr 20 Erie City Boiler SAGOH-15, and the 20.3 MMBtu/hr 21 Erie City Boiler SAGOH-15 (Emission Unit ID #1, 2 and 3) shall not exceed the limits specified below:

### **Emission Unit ID #1 (26 MMBtu/hr)**

#### **PM-10**

$$1.0906(26 + 13.3 + 20.3)^{-0.2594} = \underline{0.38} \text{ lbs/MMBtu}$$

### **Emission Unit #2 (13.0 MMBtu/hr)**

#### **PM-10**

$$1.0906(26 + 13.3 + 20.3)^{-0.2594} = \underline{0.38} \text{ lbs/MMBtu}$$

### **Emission Unit ID #3 (20.0 MMBtu/hr)**

#### **PM-10**

$$1.0906(26 + 13.3 + 20.3)^{-0.2594} = \underline{0.38} \text{ lbs/MMBtu}$$

(9 VAC 5-40-900 and 9 VAC 5-80-110)

2. **Fuel Burning Equipment Requirements – (Emission Unit ID #1, 2 and 3) - Limitations**  
- Visible Emissions from each of the boiler stacks shall not exceed 20% opacity except for one six-minute period in any one hour of not more than 60% opacity. Failure to meet the preceding requirements because of the presence of water vapor shall not be a violation of these requirements.  
(9 VAC 5-40-940 and 9 VAC 5-80-110)
3. **Fuel Burning Equipment Requirements – (Emission Unit ID #1, 2 and 3) - Monitoring and Recordkeeping** – The permittee shall perform monthly checks for visible emissions during the operation of each of the boilers (Emission Unit ID #1, 2 and 3). If visible emissions are observed, the permittee shall take timely corrective action such that the unit(s) resume operation with no visible emissions, or perform a visible emissions evaluation (VEE) in accordance with 40 CFR 60, Appendix A Method 9 to assure that the boiler(s) do not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60% opacity. The VEE shall be conducted for a minimum period of six minutes. If compliance is not demonstrated by the VEE, timely corrective action shall be taken such that the boiler resumes operation that is in compliance with the opacity limit. The facility shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observation, whether or not there were visible emissions, any VEE recordings and necessary corrective actions. If any boiler (Emission Unit ID #1, 2 and 3) is/are not operated during the calendar month, then

no visible emission needs to be performed along with the records documenting the boilers were not operated during the calendar month. Upon request by the Department, the permittee shall conduct additional visible emission evaluations from the boilers to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be arranged with the Piedmont Regional Office.  
(9 VAC 5-80-110)

4. **MACT Requirements – (Emission Unit ID #1, 2 & 3)** – As of the date of this permit, the boilers are considered affected sources for the purposes of 40 CFR 63, Subpart DDDDD. See Condition 69 of this permit for the Boiler MACT requirements for the boilers.  
(9 VAC 5-80-110 and 40 CFR 63 Subparts A and DDDDD)

### **Fuel Burning Equipment Requirements – Fire Pump Emergency Diesel Engine (Emission Unit ID #26)**

5. **Fuel Burning Equipment Requirements – Fire Pump Emergency Diesel Engine (Emission Unit ID #26) – Federal Requirements** – The Fire Pump Emergency Diesel Engine is subject to NSPS Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:

<b>Citation</b>	<b>Requirement</b>
40 CFR 60.4205(c) and Table 4 to Subpart IIII	Emission standards
40 CFR 60.4206 and 60.4211(a) and (c)	Compliance requirements
40 CFR 60.4207(b)	Fuel requirements
40 CFR 60.4208(h)	Installing requirements
40 CFR 60.4209(a)	Monitoring requirements
40 CFR 60.4218 and Table 8 to Subpart IIII	Applicability of General Provisions to Subpart IIII

(9 VAC 5-80-110 and 40 CFR 60 Subpart IIII)

6. **Fuel Burning Equipment Requirements – Fire Pump Emergency Diesel Engine (Emission Unit ID #26) – Visible Emissions** – Visible emissions from the Fire Pump Emergency Diesel Engine shall not exceed 20% opacity, except for one six-minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this condition because of the presence of water vapor shall not be a violation of this section.  
(9 VAC 5-80-110 and 9 VAC 5-50-80)
7. **Fuel Burning Equipment Requirements – Fire Pump Emergency Diesel Engine (Emission Unit ID #26)- Monitoring** – The permittee shall perform monthly checks for any visible emissions during the operation of the Fire Pump Emergency Diesel Engine monthly during periods when the unit is operated for emergency purposes or for routine testing for a sufficient time interval to determine if there are any above-normal visible emissions. If visible emissions are observed, the permittee shall take timely corrective

action such that the fire pump engine resumes operation with no visible emissions, or perform a visible emissions evaluation (VEE) in accordance with 40 CFR 60, Appendix A Method 9 to assure that the fire pump engine does not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity. The VEE shall be conducted for a minimum period of six minutes. If compliance is not demonstrated by the VEE, timely corrective action shall be taken such that the fire pump engine resumes operation that is in compliance with the opacity limit. The facility shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observation, whether or not there were visible emissions, any VEE recordings and necessary corrective actions. Upon request by the Department, the permittee shall conduct additional visible emission evaluations from the fire pump engine to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be arranged with the Piedmont Regional Office  
(9 VAC 5-80-110)

8. **Fuel Burning Equipment Requirements – Fire Pump Emergency Diesel Engine (Emission Unit ID #26) – Recordkeeping** – The facility shall maintain records documenting conformance with applicable operating limitations, work practice, and management practice standards found in the New Source Performance Standards (NSPS) 40 CFR 60 Subpart IIII for Compression Ignition Stationary Engines. These records shall include but are not limited to:
- a. Annual hours of operation of the emergency engine, including hours spent for non-emergency operation, calculated as the sum of each consecutive 12-month period.
  - b. Maintenance conducted on the emergency engine which demonstrates that the engine is being operated and maintained according to the manufacturer's emission related written instructions.
  - c. A log of actions taken during periods of malfunction to minimize emissions, including the duration of each malfunction and the corrective actions taken to minimize emissions and restore the malfunctioning engine.
  - d. The results of the visible emission observations, visible emissions evaluations, and details of any corrective action taken as a result of these inspections.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

**Process Equipment Requirements – No. 2 Laminator Printing/Coating Stations (Emission Unit ID #29 – 30)**

9. **Process Equipment Requirements – (Emission Unit ID #29 and 30) - Limitations -** Volatile organic compound (VOC) emissions from the No. 2 Laminator (Emission Unit ID #30) printing/coating stations, when applying non-compliant inks and coatings (i.e., those not meeting the criteria in 9 VAC 5-40-5080 A.1., 2. or 3., and required to install an emissions control system) shall be controlled by a 100 percent efficient capture system and a thermal oxidizer having a minimum destruction efficiency of 96.5 percent. The No. 2 Laminator (Emission Unit ID #30) and the thermal oxidizer shall be provided with adequate access for inspection.  
(9 VAC 5-80-110 and Condition 3 of 5/15/02 Permit)

**or**

Volatile organic compound (VOC) emissions from the No. 2 Laminator (Emission Unit ID #29) printing/coating stations shall be controlled by the use of compliant inks and coatings (those meeting criteria of 9 VAC 5-40-5080 A.1., 2. or 3.)  
(9 VAC 5-80-110 and Condition 3 of 5/15/02 Permit)

10. **Process Equipment Requirements – (Emission Unit ID #29) - Limitations –** During periods when compliant inks and coatings are used, Reynolds Consumer Products LLC shall be permitted to exhaust the individual station(s) to atmosphere. Compliant inks and coatings shall be determined on an “as applied” basis per station. Averaging of the VOC content of the inks and coatings across stations to comply with 9 VAC 5-40-5080 A.1, 2 or 3 is not permitted. No thermal oxidizer efficiency shall be applied to the compliant ink usage. These emissions shall not be credited to the oxidizer. The emissions shall be accounted for in the daily recordkeeping to determine compliance with emission limits specified in Condition 16.  
(9 VAC 5-80-110 and Condition 4 of 5/15/02 Permit)
11. **Process Equipment Requirements – (Emission Unit ID #30) - Limitations -** The thermal oxidizer (associated with Emission Unit ID #30) shall maintain a minimum combustion zone temperature of 1400°F and a minimum retention time of 0.5 seconds. The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone and an indication of date and time.  
(9 VAC 5-80-110 and Condition 5 of 5/15/02 Permit)
12. **Process Equipment Requirements – (Emission Unit ID #30) - Limitations –** Each total enclosure of the capture system shall meet the following criteria:
- a. Any natural draft openings shall be at least four equivalent opening diameters from each VOC emitting point;
  - b. The total area of all natural draft openings shall not exceed five percent of the surface area of the enclosure’s four walls, floor and ceiling;

- c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
- d. All access doors and windows shall be closed during routine operation of the laminator printing/coating stations.

(9 VAC 5-80-110 and Condition 6 of 5/15/02 Permit)

13. **Process Equipment Requirements – (Emission Unit ID #29 and 30) - Limitations –**  
The approved auxiliary fuels for the dryers and the thermal oxidizer are natural gas and a propane/air mixture. A change in the fuel may require a permit to modify and operate.  
(9 VAC 5-80-110 and Condition 8 of 5/15/02 Permit)

14. **Process Equipment Requirements – (Emission Unit ID #29 and 30) - Limitations –**  
The No. 2 Laminator (Emission Unit ID #30) shall operate at a maximum speed of 1,000 feet per minute while using inks and coatings that contain volatile organic compounds. There shall be no speed limitation while the No. 2 Laminator (Emission Unit ID #29) is using inks and coatings that contain no volatile organic compounds.  
(9 VAC 5-80-110 and Condition 7 of 5/15/02 Permit)

15. **Process Equipment Requirements – (Emission Unit ID #29 and 30) - Limitations –**  
Visible emissions from the No. 2 Laminator (Emission Unit ID #29 and 30) process shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emission shall not exceed 30% opacity.  
(9 VAC 5-80-110 and 9 VAC 5-50-80)

16. **Process Equipment Requirements – (Emission Unit ID #29 and 30) - Limitations -**  
Emissions from the operation of the No. 2 Laminator (Emission Unit ID #30) shall not exceed the limits specified below:

Volatile Organic Compounds	57.5 lbs/hr	1,380 lbs/day	29.6 tons/yr
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(9 VAC 5-80-110, and Condition 9 of 5/15/02 Permit)

17. **Process Equipment Requirements – (Emission Unit ID #30) - Monitoring -** The thermal oxidizer (associated with Emission Unit ID #30) shall maintain a minimum combustion zone temperature of 1400°F and a minimum retention time of 0.5 seconds. The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone and an indication of date and time.  
(9 VAC 5-80-110 and Condition 5 of 5/15/02 Permit)

18. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM) -** The permittee shall monitor, operate, calibrate and maintain the thermal oxidizer controlling the No. 2 Laminator according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
A circular paper chart records temperature data continuously and temperature data is also recorded electronically to a backup disk system.	Thermal oxidizer combustion chamber temperature measured by a temperature sensor/thermocouple	Combustion chamber temperature must be maintained at a minimum of 1400°F and minimum combustion zone retention time is 0.5 seconds.  The set point for the interlock shall be set at 1410°F. If the oxidizer temperature falls below 1410°F, the interlock shuts down the laminator.
Differential pressure meters are installed at each enclosure, each one has an accuracy rating of +/- 1% full scale.	100% capture efficiency maintained by existence of a permanent total enclosure (PTE).	A differential pressure drop of less than 0.007 inches W.C. which occurs for greater than five minutes activates an audible alarm which requires immediate corrective action.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

19. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.  
 (9 VAC 5-80-110 and 40 CFR 64.6 (c))
20. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
 (9 VAC 5-80-110 and 40 CFR 64.7 (b))
21. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the No. 2 Laminator is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and

calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.

(9 VAC 5-80-110 and 40 CFR 64.7 (c))

22. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the No. 2 Laminator (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.  
(9 VAC 5-80-110 and 40 CFR 64.7 (d)(1))
23. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.  
(9 VAC 5-80-110 E and 40 CFR 64.7(d)(2))
24. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.  
(9 VAC 5-80-110 and 40 CFR 64.7(e))
25. **Process Equipment Requirements – (Emission Unit ID #30) - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the No. 2 Laminator for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for

inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

- a. Improved preventative maintenance practices;
- b. Process operation changes;
- c. Appropriate improvements to control methods;
- d. Other steps appropriate to correct control performance; and
- e. More frequent or improved monitoring.

(9 VAC 5-80-110 and 40 CFR 64.8(a) and (b))

**26. Process Equipment Requirements – (Emission Unit ID #29 and 30) - Recordkeeping -**

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:

- a. Daily records demonstrating compliance with the requirements in Air Quality Program Policies and Procedures, Number AQP-4.
- b. Continuous thermal oxidizer (associated with Emission Unit ID #30) combustion zone temperature records, indicating date and time.
- c. Records demonstrating compliant inks and coatings, as applied, meet the criteria in 9 VAC 5-40-5080 A1., 2. or 3.
- d. Annual VOC emission calculations, calculated monthly as the sum of each consecutive twelve (12) month period.
- e. Inventory of spare parts to minimize durations of air pollution control equipment breakdowns.
- f. Written operating procedures for all air pollution control equipment.
- g. Operator training records.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 11 of 5/15/02 Permit)

27. **Process Equipment Requirements – (Emission Unit ID #29) - Testing** - The DEQ may require testing to determine if compliant ink meets the definition of compliant ink contained in 9 VAC 5-40-5070 of the Regulations.  
(9 VAC 5-80-110 and Condition 10 of 5/15/02 permit)

**Process Equipment Requirements – Wash Room (Emission Unit ID #32-1, 32-2 and 32-3)**

28. **Process Equipment Requirements – (Emission Unit ID #32-1) - Limitations - VOC** emissions from the press parts washing machines (Emission Unit ID #32-1) shall be controlled by a condenser recovery system. The unit shall be equipped with a temperature gauge. The unit shall be provided with adequate access for inspection.  
(9 VAC 5-80-110 and Condition 3 of 5/30/01 Permit)
29. **Process Equipment Requirements – (Emission Unit ID #32-1) - Limitations - The** operating rate of the three parts washing machines shall not exceed 1 cycle/hour, per washing machine, when using a solvent based (greater than 4.5% VOC) wash solution. The operating rate of the three press parts washing machines shall not exceed 3/cycles/hour, per washing machine, when using low solvent (4.5% VOC or less), based cleaning solution.  
(9 VAC 5-80-110 and Condition 4 of 5/30/01 Permit)
30. **Process Equipment Requirements – (Emission Unit ID #32-1 and 32-2) - Limitations –** Except as specified in this permit, the solvent metal cleaning operation (Emission Unit ID #32-1 and 32-2) is to be operated in compliance with (Rule 4-24) of State Regulations.  
(9 VAC 5-80-110 and Condition 5 of 5/30/01 Permit)
31. **Process Equipment Requirements – (Emission Unit ID #32-3) - Limitations - The** water-based cleaning operations at the filter wash tank (Emission Unit ID #32-3) shall be soap and water. A change in the operation may require a permit to modify and operate.  
(9 VAC 5-80-110 and Condition 6 of 5/30/01 Permit)
32. **Process Equipment Requirements – (Emission Unit ID #32-1) - Limitations - The** solvents used in the press parts washing machines (Emission Unit ID #32-1) shall contain no hazardous air pollutants (HAP) greater than one percent by weight. A change in the solvent HAP content may require a permit to modify and operate.  
(9 VAC 5-80-110 and Condition 7 of 5/30/01 Permit)
33. **Process Equipment Requirements – (Emission Unit ID #32-1 and 32-2) - Limitations -** The three press parts washing machines (Emission Unit ID #32-1) shall use no more than 53 tons volatile organic compounds (VOC) per year, calculated as the sum of each consecutive 12 month period. The manual wash tank (Emission Unit ID #32-2) shall use no more than 20 tons VOC per year, calculated as the sum of the each consecutive 12 month period. The total use for the solvent metal cleaning operation (Emission Unit ID

#32-1 and 32-2) shall not exceed 73 tons VOC per year, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 9 of 5/30/01 Permit)

34. **Process Equipment Requirements – (Emission Unit ID #32-1) - Limitations -** Visible emissions from the condenser recovery system process (associated with Emission Unit ID #32-1) shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.  
(9 VAC 5-50-80 and 9 VAC 5-80-110)
35. **Process Equipment Requirements – (Emission Unit ID #32-1) - Limitations -** Emissions from the operation of the three press parts washing machines (Emission Unit ID #32-1) shall not exceed the limits specified below:

Volatile Organic Compounds	15.7 lbs/hr	53 tons/yr
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(9 VAC 5-80-110 and Condition 10 of 5/30/01 Permit)

36. **Process Equipment Requirements – (Emission Unit ID #32-2) - Limitations -** Emissions from the operation of the manual wash tank (Emission Unit ID #32-2) shall not exceed the limits specified below:

Volatile Organic Compounds	4.6 lbs/hr	20 tons/yr
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(9 VAC 5-80-110 and Condition 11 of 5/30/01 Permit)

37. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM) -** The permittee shall monitor, operate, calibrate and maintain the condenser recovery system controlling the press parts washing machines according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
Temperature gauge readings shall be recorded continuously and will be kept onsite for a minimum of five years.	Chiller water supply temperature shall be measured using a temperature gauge.	Temperature shall be maintained at or below 60°F (while the washing machines are operating). An interlock shall prevent each machine from operating when chill water supply is above 60°F.

(9 VAC 5-80-110 and 40 CFR 64.6 (c))

38. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.  
(9 VAC 5-80-110 and 40 CFR 64.6 (c))
39. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
(9 VAC 5-80-110 and 40 CFR 64.7 (b))
40. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the three press parts washing machines are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.  
(9 VAC 5-80-110 and 40 CFR 64.7 (c))
41. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the press parts washing machines (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.  
(9 VAC 5-80-110 and 40 CFR 64.7 (d)(1))

42. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.  
(9 VAC 5-80-110 and 40 CFR 64.7(d)(2))
43. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.  
(9 VAC 5-80-110 and 40 CFR 64.7(e))
44. **Process Equipment Requirements – (Emission Unit ID #32-1) - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the three press parts washing machines for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:
- a. Improved preventative maintenance practices;
  - b. Process operation changes;
  - c. Appropriate improvements to control methods;
  - d. Other steps appropriate to correct control performance; and
  - e. More frequent or improved monitoring.
- (9 VAC 5-80-110 and 40 CFR 64.8(a) and (b))
45. **Process Equipment Requirements – (Emission Unit ID #32-1 and 32-2) – Monitoring and Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:

- a. The annual emissions from the press parts washing machines (Emission Unit ID #32-1) and the manual wash tank (Emission Unit ID #32-2), calculated as the sum of each consecutive 12 month period. Records shall be kept for the press parts washing machines and individual records for the manual wash tank (Emission Unit ID #32) to show compliance with Conditions 33, 35 and 36. The emissions may be calculated by use of a mass balance or other method as directed or approved by the DEQ.
- b. A mass balance supporting an emission estimate shall include: amount consumed in the process (records indicating amount of replacement solvent, or solution, will be acceptable measure of material consumed); amount of material disposed; and other records as required of any other manner in which VOC exits the process.
- c. Records shall be kept demonstrating the VOC content and HAP content of each solvent, or solution, used in the metal cleaning operation. Acceptable records to demonstrate VOC content shall be the use of current material safety data sheets (MSDS) or current certified product data sheets (CPDS) provided the information contained therein is determined using approved EPA test methods (e.g. 40 CFR part 60 appendix A – EPA Method 24). Current Material Safety Data Sheets (MSDS) shall be kept on site for each type of solvent or solution used in the metal cleaning operation – including the VOC content of each.
- d. The hourly emissions from the press parts washing machines. Hourly emissions may be calculated with an emission factor based on a six-month averaging period. The records supporting the emission factor shall include the emissions and the number of batches for the averaging period.
- e. Records shall be kept demonstrating compliance or non-compliance with “Emission standards for solvent metal cleaning operations using non-halogenated solvents (Rule 4-24)”.
- f. Records shall be kept of the number of cycles/hr each press parts washing machine operated at and what % VOC cleaning solutions were used for each cycle.
- g. Records (i.e. material safety data sheets (MSDS) and/or certified product data sheets (CPDS)) shall be kept of the materials/solutions used to clean the filter wash tank and the glue wash tank.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 12 of 5/30/01 Permit)

**Process Equipment Requirements – Presses, Extruders, No. 3 Laminator and Press 3 Treating Station (Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12 and 24)**

46. **Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-4, 21-10, 21-11 and 21-12) - Limitations** - The reduction in volatile organic compound emissions from Presses Number 1, 2, and 4, Extruders Number 1, 2, and 3, and the Press 3 treating station shall not be less than sixty-five (65) percent, by weight on a daily basis over the historical amount of solvent used to apply the same amount of solids. Across line averaging of emission reductions will be utilized to determine compliance with the specified daily emission reduction requirement.  
(9 VAC 5-80-110 and Condition 3 of October 20, 2015 Permit)
47. **Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-4, 21-10, 21-11 and 21-12) - Limitations** – Compliance with the requirements of Condition 46 will be determined by the use of a “Daily VOC Model”. The model will calculate daily emission reductions by comparing actual material usings to the historical amount of solvent bearing material used. The model will calculate daily emissions by measuring, on a job basis, all VOC bearing materials consumed. Total job VOC usings shall be apportioned to individual days based on production records. The daily historical amount of solvent which would have been used shall be calculated by factors relating the daily amount of applied solids and the historical amount of solvent required to apply a pound of solids. The historical factors and compliance calculations are shown in Attachment A.  
(9 VAC 5-80-110 and Condition 4 of October 20, 2015 Permit)
48. **Process Equipment Requirements – (Emission Unit ID #24) - Limitations** – The Board has determined that RACT for No. 3 Laminator is an emission limit of 2.0 tons per day. Attachment B to the October 20, 2015 Permit outlines the basis for this determination.  
(9 VAC 5-80-110 and Condition 5 of October 20, 2015 Permit)
49. **Process Equipment Requirements – (Emission Unit ID #21-3) - Limitations** – Volatile organic compound (VOC) emissions from Press Number 3 (Emission Unit ID #21-3), when applying non-compliant inks and coatings (i.e., those not meeting the criteria in 9 VAC 5-40-5080 A.1., 2. or 3., and required to install an emissions control system) shall be controlled by a thermal oxidizer having a minimum overall control efficiency of 65 percent by weight. Press Number 3 (Emission Unit ID #21-3) and the thermal oxidizer shall be provided with adequate access for inspection.  
or  
Volatile organic compound (VOC) emissions from Press Number 3 (Emission Unit ID #21-3) shall be controlled by the use of compliant inks and coatings (those meeting criteria of 9 VAC 5-40-5080 A.1., 2. or 3.)  
(9 VAC 5-80-110 and 9 VAC 5-40-5080)

50. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** – When using non-compliant inks as described in Condition 49, the permittee shall monitor, operate, calibrate and maintain the thermal oxidizer controlling Press Number 3 (emission unit ID# 21-3) according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
<p>The thermal oxidizer's combustion chamber temperature shall be recorded continuously on a circular paper chart.</p> <p>Records of date and time of interlock shutdowns are maintained.</p>	<p>Thermal oxidizer combustion chamber temperature measured by a temperature sensor/thermocouple.</p>	<p>During operation of press 3, combustion chamber temperature shall be maintained at a minimum of 1400°F.</p> <p>The set point for the interlock shall be set at 1405°F. Temperatures below 1400°F (while the press is running "solvent based material*") shall be considered deviations.</p>

\*: "Solvent Based Material" - inks/coatings which do not meet the definition of high solids, low VOC or waterborne as defined under 9 VAC 5 Chapter 40, Part II, Article 36.

(9 VAC 5-80-110 and 40 CFR 64.6 (c))

51. **Process Equipment Requirements – (Emission Unit ID #21-3) - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.  
(9 VAC 5-80-110 and 40 CFR 64.6 (c))

52. **Process Equipment Requirements – (Emission Unit ID #21-3) - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
(9 VAC 5-80-110 and 40 CFR 64.7 (b))

53. **Process Equipment Requirements – (Emission Unit ID #21-3) - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the three press parts washing machines are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data

availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.  
(9 VAC 5-80-110 and 40 CFR 64.7 (c))

54. **Process Equipment Requirements – (Emission Unit ID #21-3) - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the press parts washing machines (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.  
(9 VAC 5-80-110 and 40 CFR 64.7 (d)(1))

55. **Process Equipment Requirements – (Emission Unit ID #21-3) - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.  
(9 VAC 5-80-110 and 40 CFR 64.7(d)(2))

56. **Process Equipment Requirements – (Emission Unit ID #21-3) - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.  
(9 VAC 5-80-110 and 40 CFR 64.7(e))

57. **Process Equipment Requirements – (Emission Unit ID #21-3) - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the three press parts washing machines for a semiannual reporting period, the permittee shall develop, implement and maintain a

Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

- a. Improved preventative maintenance practices;
- b. Process operation changes;
- c. Appropriate improvements to control methods;
- d. Other steps appropriate to correct control performance; and
- e. More frequent or improved monitoring.

(9 VAC 5-80-110 and 40 CFR 64.8(a) and (b))

58. **Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-4, 21-10, 21-11 and 21-12) – Recordkeeping and Reporting** – Records consisting of information as to the calculated daily reduction in emissions of volatile organic compounds from the affected facilities, except those emissions treated by add-on control equipment at the Plant, shall be kept available at the plant for at least five years.

(9 VAC 5-80-110 and Condition 6 of October 20, 2015 Permit)

59. **Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-4, 21-10, 21-11 and 21-12) – Reporting** – Reynolds Consumer Products LLC shall provide the Board an exception report at the end of any quarter when Condition 46 is not met.

(9 VAC 5-80-110 and Condition 7 of October 20, 2015 Permit)

**Emission Standards for Volatile Organic Compound Storage and Transfer Operations (Rule 4-25) – (Emission Unit ID #I01 and I14, I02 – I13, I15 and I16, and I18)**

60. **Process Equipment Requirements – (Emission Unit ID #I01 and I14, I02 – I13, I15 and I16 and I18) - Limitations** - Storage Tank I.D. #I01 and I14, I02 – I13, I15 and I16 and I18 shall be equipped with a control method that will remove, destroy or prevent the discharge into the atmosphere of at least 60% by weight of volatile organic compound emissions during the filling of such tank. The 60% reduction by weight shall be achieved by filling of Storage Tank ID. #s. I01 and I14, I02 – I13, I15 and I16 and I18 through the use of a vapor control system such as a submerged fill pipe.

(9 VAC 5-80-110 and 9 VAC 5-40-3430 A.1.)

## **Facility Wide Conditions**

61. **Facility Wide Conditions - Limitations** - Unless otherwise specified in this part, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any one hour of not more than 60% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. This standard is applicable to the following Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12 and 24.  
(9 VAC 5-80-110, and 9 VAC 5-50-80)
62. **Facility Wide Conditions - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.  
(9 VAC 5-40-30 or 9 VAC 5-50-30 and 9 VAC 5-80-110)
63. **Facility Wide Conditions - Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
(9 VAC 5-80-110)

**National Emission Standards for the Printing and Publishing Industry –  
(Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12, 24, 29 and 30)**

64. **MACT Subpart KK - Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12, 24, 29 and 30) – Limitations/Standards** - Each product and packaging rotogravure printing affected source shall limit organic HAP emissions to no more than 5 percent of the organic HAP applied for the month; or to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvent, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of the solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in paragraphs 40 CFR 63.825 (b)(1) – (b)(10). (9 VAC 5-80-110 and 40 CFR 63.825(b))
65. **MACT Subpart KK - Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12, 24, 29 and 30) – Performance Test Methods** - The owner or operator may use formulation data to determine the weight fraction organic HAP of a material. Formulation data may be provided to the owner or operator on a consumer product data sheet (CPDS) by the supplier of the material or an independent third party. Formulation data may be used provided that the weight fraction organic HAP is calculated according to the criteria and procedures in 40 CFR 63.827(b)(2)(iii)(A) through (D). In the event of an inconsistency between the formulation data and the result of Method 311 (ref. 40 CFR 63, Appendix A), where the test result is higher, the Method 311 data will take precedence unless, after consultation, the permittee can demonstrate to the satisfaction of the enforcement agency (Virginia Department of Environmental Quality (VADEQ) – Piedmont Regional Office (PRO)) that the formulation data are correct. (9 VAC 5-80-110 and 40 CFR 63.827(b)(2)(iii))
66. **MACT Subpart KK - Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12, 24, 29 and 30) - Recordkeeping** - The recordkeeping provisions of 40 CFR 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40 CFR 63 Subpart KK are listed in Table 1 to Subpart KK of Part 63. (9 VAC 5-80-110 and 40 CFR 63.829(a))
67. **MACT Subpart KK - Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12, 24, 29 and 30) – Recordkeeping/Monitoring** – The permittee shall maintain the records specified in 40 CFR 63.10(b) on a monthly basis, of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report. (9 VAC 5-80-110 and 40 CFR 63.829(b))

68. **MACT Subpart KK - Process Equipment Requirements – (Emission Unit ID #21-1, 21-2, 21-3, 21-4, 21-10, 21-11, 21-12, 24, 29 and 30) - Reporting** – The reporting provisions of 40 CFR 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40 CFR 63 Subpart KK are listed in Table 1 to Subpart KK of Part 63.  
(9 VAC 5-80-110 and 40 CFR 63.830(a))

**National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters – (Emission Unit ID #1, 2 and 3)**

69. **Fuel Burning Equipment Requirements (Emission Unit ID #1, 2, and 3) – Limitations – Requirements by Reference** – Except where this permit is more restrictive than the applicable requirement, the permittee shall operate in compliance with all applicable requirements of 40 CFR 63 (MACT), Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (for units designed to burn Gas 1 fuels). The permittee shall be in compliance with the provisions of 40 CFR 63, Subpart A, except as noted in Table 10 to Subpart DDDDD of Part 63.

Citation	Requirement
40 CFR 63.7500(a)(3)(e) and Table 3 to Subpart DDDDD of Part 63	Work Practice Standards
40 CFR 63.7545	Notification requirements
40 CFR 63.7550(b)	Reporting requirements
40 CFR 63.7555(a)	Recordkeeping requirements
Table 10 to Subpart DDDDD of Part 63	Applicability of General Provisions to Subpart DDDDD

(9 VAC 5-80-110 and 40 CFR 63 Subparts A and DDDDD)

## Insignificant Emission Units

70. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
I01	Hot air heater (washroom)	9 VAC 5-80-720 C		1.2 MMBtu/hr to 2.5 MMBTU/HR
I02	Hot oil heater (washroom)	9 VAC 5-80-720 C		0.9 MMBtu/hr
I03	Oil/lubricant dispensing & used oil in maintenance area	9 VAC 5-80-720 B	VOC	Approx. 600 gal and less.
I04	Trim handling system for bailers, cutters and extruders	9 VAC 5-80-720 B	PM	
I05	Water wash tank (washroom)	9 VAC 5-80-720 A	VOC	
I06	Oil-water separator	9 VAC 5-80-720 B	VOC	
I08	Storage Tank (AST 17) 125,000 gallon tank #6 fuel oil	9 VAC 5-80-720 B	VOC	
I09	Core Cutting	9 VAC 5-80-720 B	PM	
I10	Pellet Conveying System	9 VAC 5-80-720 B	PM	
I11	Rubber Roll Grinder	9 VAC 5-80-720 B	PM	
I12	Wax Heaters	9 VAC 5-80-720 B	VOC	Approx. 40 gallons
I13	Vacuum Cleaning System	9 VAC 5-80-720 B	PM	
I14	Blown Film Extruder	9 VAC 5-80-720 B	VOC	40 lbs/hr
I18	Slitters	9 VAC 5-80-720 B	PM	
I19	Gluers	9 VAC 5-80-720 B	VOC	
I20	Carton Cutter Creasers	9 VAC 5-80-720 B	PM	
I21	Washroom Solvent Recovery System	9 VAC 5-80-720 B	VOC	
I22	Cooling Towers	9 VAC 5-80-720 A	PM	
I23	Spoolers	9 VAC 5-80-720 B	PM	600 feet per minute
I24	Solvent Parts Washer – Ink Room (1) solvent	9 VAC 5-80-720 C	VOC	
I25	Solvent parts washer (3), solvent cleaning of metal parts	9 VAC 5-80-720 C	VOC	
I27 & I28	Diagraph Inkjet Date Code Printer – Spooling Lines 1 & 2 – Water Based Ink	9 VAC 5-80-720 B	VOC	

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

(9 VAC 5-80-110 and 9 VAC 5-80-140)

## Permit Shield & Inapplicable Requirements

71. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
None Identified		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-110 and 9 VAC 5-80-140)

## General Conditions

72. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.  
(9 VAC 5-80-110)
73. **General Conditions - Permit Expiration** - This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.  
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
74. **General Conditions - Permit Expiration** - The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.  
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)

75. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.  
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
76. **General Conditions - Permit Expiration** - No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.  
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
77. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.  
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
78. **General Conditions - Permit Expiration** - The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.  
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
79. **General Conditions - Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
- a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.
  - f. The operating conditions existing at the time of sampling or measurement.
- (9 VAC 5-80-110)

80. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.  
(9 VAC 5-80-110)

81. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
  - (1) Exceedance of emissions limitations or operational restrictions;
  - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
  - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110)

82. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31.

- b. The identification of each term or condition of the permit that is the basis of the certification.
- c. The compliance status.
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- f. Such other facts as the permit may require to determine the compliance status of the source.
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3\_APD\_Permits@epa.gov

(9 VAC 5-80-110)

- 83. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Piedmont Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 81 of this permit.  
(9 VAC 5-80-110 F.2)
- 84. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Piedmont Regional Office of such failure or malfunction and within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Piedmont Regional Office.  
(9 VAC 5-80-110 and 9 VAC 5-20-180)

85. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.  
(9 VAC 5-80-110)
86. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.  
(9 VAC 5-80-110)
87. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.  
(9 VAC 5-80-110)
88. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.  
(9 VAC 5-80-110, 9 VAC 5-80-190 and 9 VAC 5-80-260)
89. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.  
(9 VAC 5-80-110)
90. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.  
(9 VAC 5-80-110)
91. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.  
(9 VAC 5-80-110)
92. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350 in addition

to an annual permit maintenance fee consistent with the requirements of 9 VAC 5-80-2310 through 9 VAC 5-80-2350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. The amount of the annual permit maintenance fee shall be the largest applicable base permit maintenance fee amount from Table 8-11A in 9 VAC 5-80-2340, adjusted annually by the change in the Consumer Price Index.

(9 VAC 5-80-110, 9 VAC 5-80-340 and 9 VAC 5-80-2340)

93. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
  - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
  - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90, 9 VAC 5-50-90 and 9 VAC 5-80-110)

94. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E, 9 VAC 5-40-20 E and 9 VAC 5-80-110)

95. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.  
(9 VAC 5-80-110)
96. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
  - d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (9 VAC 5-80-110)
97. **General Conditions - Reopening For Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F. The conditions for reopening a permit are as follows:
- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110)

- 98. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.  
(9 VAC 5-80-110 and 9 VAC 5-80-150)
- 99. **General Conditions - Transfer of Permits** - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.  
(9 VAC 5-80-110 and 9 VAC 5-80-160)
- 100. **General Conditions - Transfer of Permits** - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-110 and 9 VAC 5-80-160)
- 101. **General Conditions - Transfer of Permits** - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-110 and 9 VAC 5-80-160)
- 102. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.  
(9 VAC 5-80-110, 9 VAC 5-80-190 C and 9 VAC 5-80-260)
- 103. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9 VAC 5-80-110 and 9 VAC 5-80-80 E)

104. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(9 VAC 5-80-110 and 40 CFR Part 82)
105. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).  
(9VAC5-60-70 and 9VAC5-80-110)
106. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(9VAC5-80-110 and 40 CFR Part 68)
107. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.  
(9VAC5-80-110)
108. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
  - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
  - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110)

Emission Calculations Formulas  
to Calculate Estimated Percent Reduction of VOC

Bellwood Printing Plant  
Registration No. 50260

R1	=	4.3093	Constant based on two year solvent/solid ratio for solvent inks	
R2	=	5.7709	Constant based on two year solvent/solid ratio for solvent O/C*	
R3	=	92.1007	Constant based on two year solvent/solid ratio for solvent treating	
R4	=	12.0523	Constant based on two year solvent/solid ratio for solvent thermos and H/S*	
X0	=	Calculated solvents replaced by WB* inks	=	(R1 X # Solids in WB inks)
X1	=	Calculated solvents replaced by WB O/C	=	(R2 X # Solids in WB O/C)
X2	=	Calculated solvents replaced by WB treating	=	(R3 X # Solids in WB treating)
X3	=	Calculated solvents replaced by WB thermos	=	(R4 X # Solids in WB thermos and H/S)
X4	=	Total actual solvent (alcohol) content in WB inks	=	Actual
X5	=	Total actual solvent (alcohol) content in WB O/C	=	Actual
X6	=	Total actual solvent (alcohol) content in WB treats	=	Actual
X7	=	Total actual solvent (alcohol) content in WB thermos and H/S	=	Actual
X8	=	Total actual solvent content in solvent inks	=	Actual
X9	=	Total actual solvent content in solvent O/C	=	Actual
X10	=	Total actual solvent content in solvent treat	=	Actual
X11	=	Total actual solvent content in solvent thermos and H/S	=	Actual
X12	=	Total actual solvent (alcohol) content in M numbers*	=	Actual
X13	=	Total pounds of raw solvent used	=	Actual
X14	=	Total actual solvent usage for time period	=	X4+X5+X6+X7+X8+X9+X10+X11+X12+X13
X15	=	Total estimated solvents the plant is capable of using if WB Materials were not used	=	X14+X0+X1+X2+X3-X4-X5-X6-X7
X16	=	Total pounds reduction	=	X15 - X14
X17	=	Percent reduction	=	((X15 - X14)/X15 X 100)

\* O/C - Overcoat      M Numbers - Reynolds internal code to identify materials  
H/S - Heatseal  
WB - Waterbase